EX PARTE OR LATE FILED DOCKET FILE COPY ORIGINAL
PAUL D.P. SPEARMAN
(1936-1961)
FRANK ROBERSON
(1936-1961)

ANNE GOODWIN CRUMP*
VINCENT J. CURTIS, JR.
THOMAS J. DOUGHERTY, JR.
JAMES G. ENNIS
PAUL J. FELDMAN*
BICHARD HIS DEET!

FLETCHER, HEALD & HILDRETH

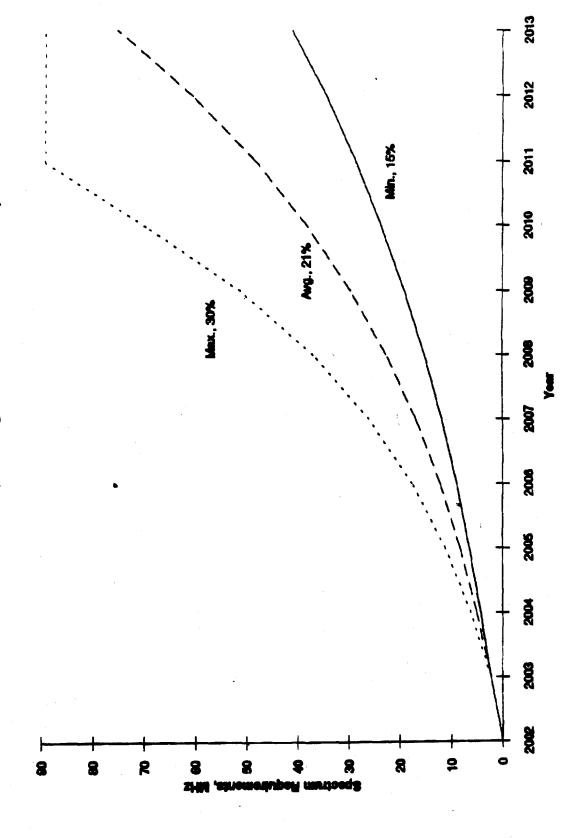
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PRESENTATION BY MOTOROLA INC. TO FEDERAL COMMUNICATIONS COMMISSION

USE OF 2 GHz EMERGING TECHNOLOGY BANDS BY IRIDIUM-TYPE SYSTEMS

MAY 11, 1993

d growth in CONUS Spectrum Requirements for Iridium type Communications 2 GHz Band (secuming 10.5 WHz available at L Band)



GROWTH, 6.34.C EVINES

PROJECTED CONUS SPECTRUM REQUIREMENTS FOR IRIDIUM-TYPE SYSTEMS

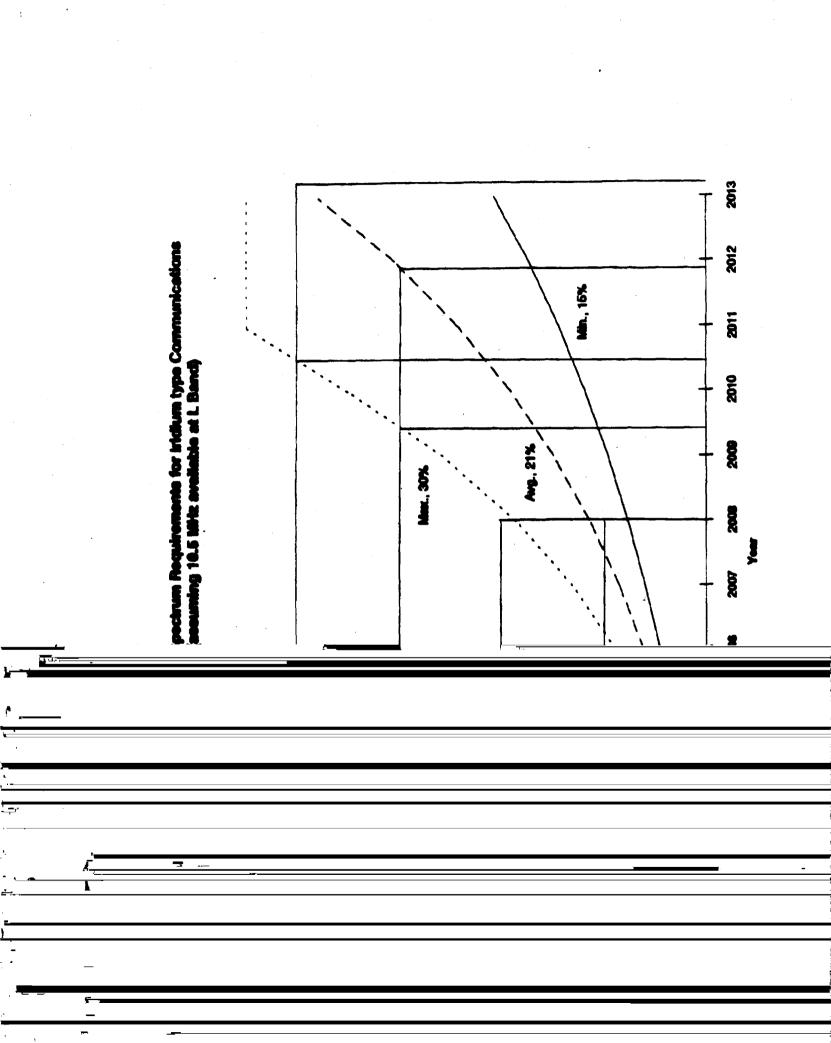
- BASED ON COMPUTER MODEL, IRIDIUM-TYPE SYSTEMS WILL NEED 12.8 MHz BY THE YEAR 2003 (I.E., END OF FIRST GENERATION)
- ADDITIONAL SPECTRUM NEEDED FOR IRIDIUM-TYPE SYSTEMS BEYOND THE YEAR 2003 (I.E., NOT COUNTING THE 10.5 MHz OF L-BAND ASSUMED AVAILABLE):

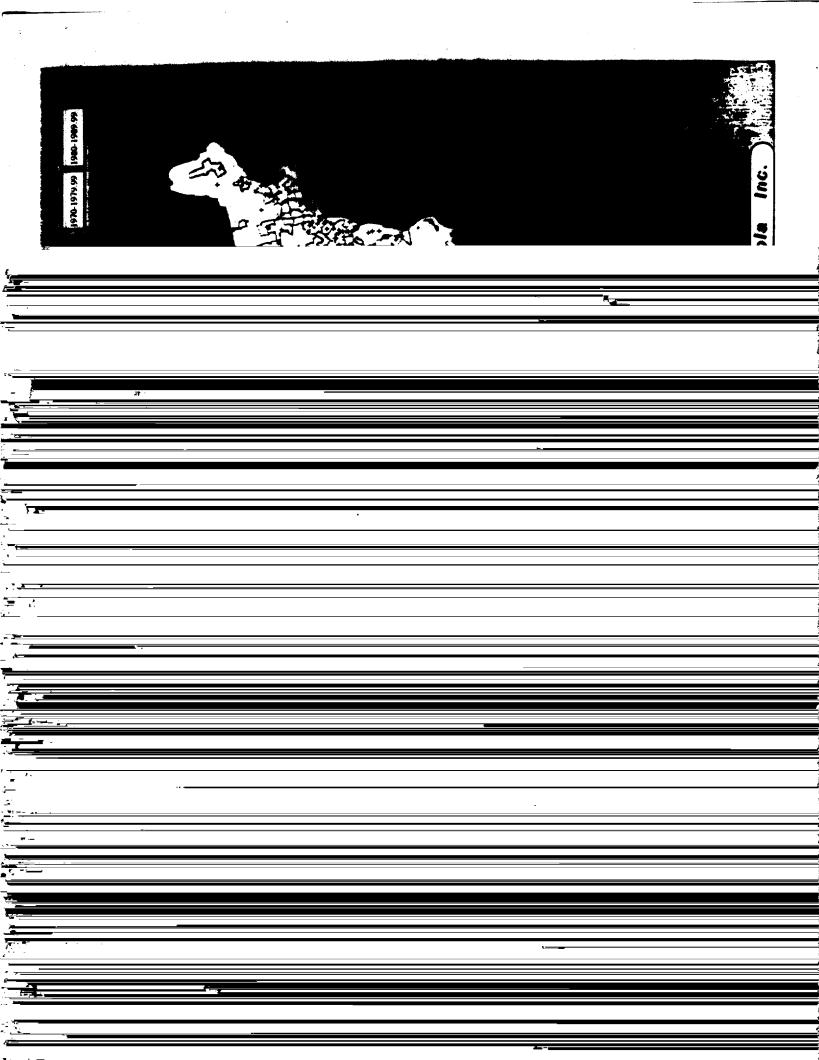
	GROWTH RATE			
YEAR	<u>15%</u>	21%	<u>30%</u>	
2008	15.2	22.7	37.0	
2013	41.3	75.6	89.5	

NOTE: TOTAL MSS SPECTRUM REQUIREMENTS WILL EXCEED THESE FIGURES BECAUSE ABOVE PROJECTIONS DO NOT TAKE INTO ACCOUNT SPECTRUM NEEDED FOR NON-IRIDIUM-TYPE SYSTEMS

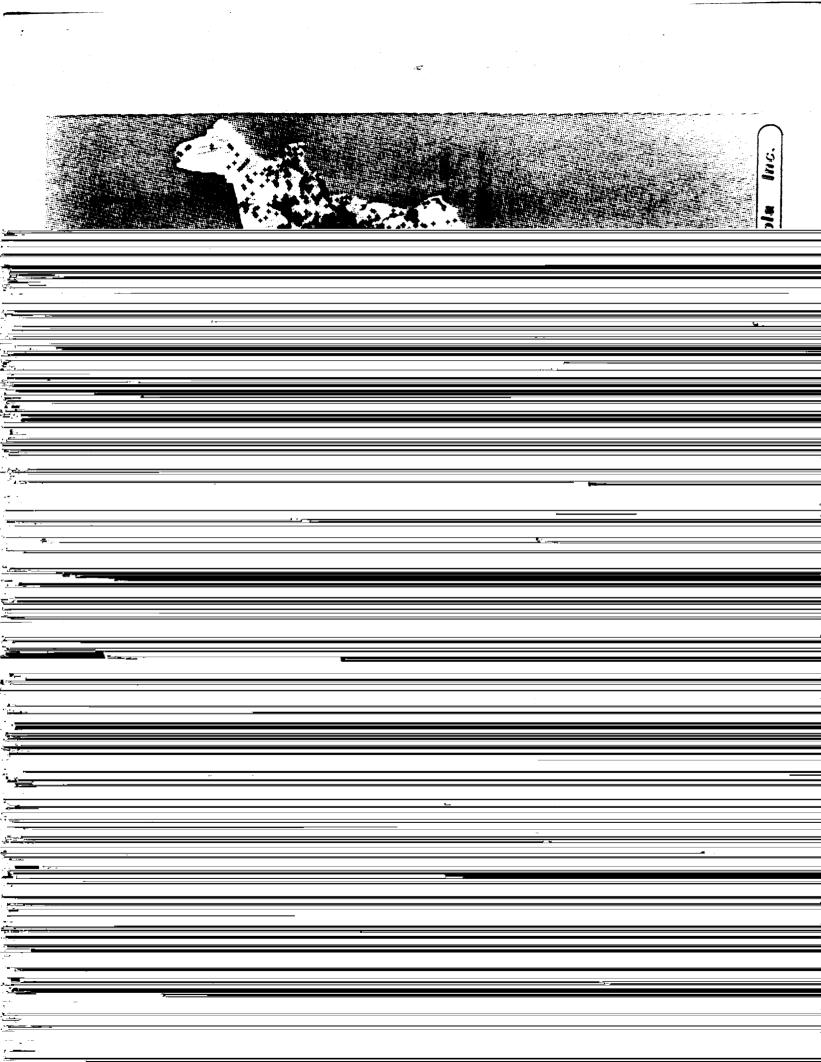
2 GHz BANDS UNDER CONSIDERATION BY MOTOROLA TO SATISFY FUTURE IRIDIUM SPECTRUM REQUIREMENTS

BAND		PATH	REGIONS	DATE
1970-1980	MHz	EARTH-TO-SPACE	REGION 2	2005
		•	U.S.	1996
1980-2010	MHz	EARTH-TO-SPACE	GLOBAL	2005
			U.S.	1996
2160-2170	MHz	SPACE-TO-EARTH	REGION 2	2005
			U.S.	1996
2170-2200	MHz	SPACE-TO-EARTH	GLOBAL	2005
			U.S.	1996





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FEASIBILITY OF SHARING

- 2160-2200 MHz DOWNLINK BANDS: SHARING WITH FIXED SERVICE NOT POSSIBLE
 - • RR 746X ADOPTED AT WARC-92 HAS COORDINATION TRIGGER OF -142 TO -152 dBW/m²/4 kHz

IRIDIUM REQUIRES PFD OF AT LEAST -120 dBW/m²/4 kHz

- • SHARING BY GEOGRAPHIC SEPARATION IS FEASIBLE ONLY WITHIN LARGE AREAS (E.G., ITU REGIONS). IRIDIUM CANNOT USE DIFFERENT FREQUENCIES IN AREAS AS SMALL AS THE U.S.
- 1970-1990 MHz UPLINK BAND: SHARING WITH FIXED SERVICE WOULD BE DIFFICULT GIVEN NUMBER AND DISTRIBUTION OF MICROWAVE LINKS

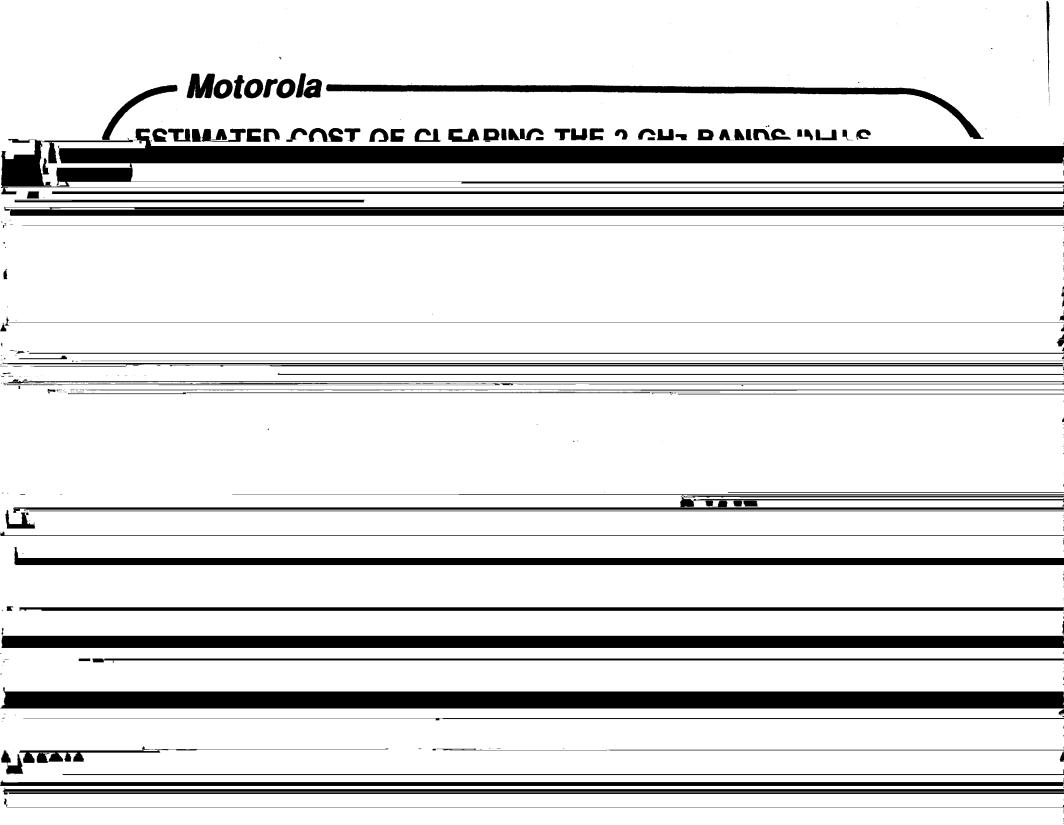
SHARING - CON'T

- 1990-2010 MHz UPLINK BAND: SHARING WITH BROADCAST AUXILIARY SERVICE (FIXED STLs & TEMP-FIXED ENG) MAY BE POSSIBLE IF DIRECTION OF MSS LINK IS REVERSED
 - MOTOROLA STUDYING POSSIBILITY OF DOWNLINK SHARING IN THIS
 BAND WITH UPLINK AT 2180-2200 MHz
 - • POSSIBILITY THAT DOWNLINK SIGNAL LEVELS WOULD NOT EXCEED THE THRESHOLDS OF TV REMOTE PICKUP UNITS
 - • WOULD REQUIRE FUTURE WARC TO REVERSE ALLOCATION DIRECTIONS
 - • ALTERNATIVE: REALLOCATE 1990-2008 MHz (I.E., 1 CHANNEL) FROM BROADCAST AUXILIARY TO MSS?
 - • WOULD STILL LEAVE BROADCASTERS WITH ANOTHER 6
 CHANNELS UP TO 2110 MHz (WITH MANY OTHER CHANNELS
 AVAILABLE IN OTHER BANDS)

SHARING - CON'T

- MOTOROLA IS ACTIVELY PARTICIPATING IN CCIR TASK GROUP 12/4
 (SHARING ISSUES BETWEEN MSS AND TERRESTRIAL SERVICES IN THE 1-3
 GHz RANGE) AND IN TASK GROUP 8/1 (FPLMTS)
- TERRESTRIAL FPLMTS ALLOCATIONS IN OTHER PARTS OF WORLD COMPLICATES SHARING SCENARIO (E.G., BANDS CLEARED FOR MSS USE

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CONCLUSIONS

- 2 GHz MSS ALLOCATIONS SHOULD BE RETAINED IN FULL
- NEED 2 GHz LICENSE BY 1999 IN ORDER TO MEET SECOND GENERATION SPECTRUM REQUIREMENTS (ASSUMES 2 YEARS TO CONSTRUCT AND LAUNCHES INITIATED 2 YEARS PRIOR TO OPERATIONAL DATE)
- DOES NOT APPEAR TO BE ECONOMICALLY FEASIBLE FOR MSS PROVIDERS TO PAY TO CLEAR SPECTRUM
- SPECTRUM REPLACEMENT PLAN FOR INCUMBENTS SHOULD BE IN PLACE BY 1996 IN ORDER TO PROVIDE A POTENTIALLY ADEQUATE AMORTIZATION PERIOD FOR EXISTING EQUIPMENT